

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
TEMITOPE ABU	:	
TAKESHIA SHONTAY ABU	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	CASE NO. 1-24-bk-02936
TEMITOPE ABU	:	
TAKESHIA SHONTAY ABU	:	
Respondent	:	

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 18th day of December 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor(s)' Plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the Debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that Debtor(s)' disposable income is greater than that which is committed to the Plan based upon disposable income on Schedules I and J and specifically disputes the following amounts:

- a. The Trustee objects to the following expenses as unreasonable:
 - i. \$3,100.00 mortgage payment
 - ii. \$300.00 childcare/education costs for children that are middle school/high school aged
 - b. Debtor #1's prorated income should be \$8,646.00 per month.
2. Failure to properly state the liquidation value in Section 1B of the Plan (once the proper exemptions are used).
3. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
- a. Pay stubs for the months of November and December 2024, pay advices for each Debtor as well as the pay advices for Debtor #1 showing any bonus received.
4. The Trustee provides notice to the Court as to the ineffectiveness of Debtor(s) Chapter 13 Plan for the following reasons:

- a. The Plan should specify which vehicle is being surrendered.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 18th day of December 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

NICHOLAS G PLATT, ESQUIRE
MOONEY LAW
230 YORK STREET
HANOVER, PA 17331-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee